

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

REDACTED

UNITED STATES OF AMERICA,)	
)	
Plaintiff)	
v.)	Criminal Action No. 08- 121
)	
RASHEEM DOLLARD,)	
)	
Defendant.)	
)	

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT ONE

On or about July 11, 2008, in the State and District of Delaware, Rasheem Dollard, defendant herein, did knowingly possess in and affecting interstate commerce, a firearm, that is, a Taurus INT MFG. PT 138 Millenium .380 ACP handgun, bearing serial number KUB22415, after having been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court in and for New Castle County, Delaware, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWO

On or about July 11, 2008, in the State and District of Delaware, Rasheem Dollard, defendant herein, did knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT III


On or about July 11, 2008, in the State and District of Delaware, Rasheem Dollard, defendant herein, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the knowing possession with intent to distribute a mixture and substance containing a detectable amount of cocaine base, as set forth in Count II of this Indictment and incorporated by reference as if fully set forth herein, knowingly possessed a firearm, that is, a Taurus INT MFG. PT 138 Millenium .380 ACP handgun, bearing serial number KUB22415, all in violation of Title 18, United States Code, Sections 924(c)(1)(A).

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Count One of this Indictment, defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to the following:

1. The Taurus INT MFG. PT 138 Millenium .380 ACP handgun, bearing serial number KUB22415; and
2. 11 rounds of ammunition.

A TRUE BILL:

Foreperson 

COLM F. CONNOLLY
United States Attorney

BY: 

John C. Snyder
Assistant United States Attorney

Dated: August 5, 2008